

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-122-LPS-CJB
	)	
GROUPON, INC.,	)	
	)	
Defendant.	)	

**NOTICE OF SERVICE**

The undersigned hereby certifies that on the 2<sup>nd</sup> day of November, 2016, **INITIAL DISCLOSURES PURSUANT TO SECTION 3 OF THE COURT'S DEFAULT STANDARD FOR DISCOVERY** were served upon the following counsel of record at the address and in the manner indicated:

David E. Moore, Esquire  
POTTER ANDERSON & CORROON LLP  
Hercules Plaza  
1313 N. Market Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801

VIA ELECTRONIC MAIL

John M. Desmarais, Esquire  
DESMARAIS LLP  
230 Park Avenue  
New York, NY 10169

VIA ELECTRONIC MAIL

ASHBY & GEDDES

*Of Counsel:*

J. David Hadden  
Saina S. Shamilov  
Phillip J. Haack  
Adam M. Lewin  
FENWICK & WEST LLP  
Silicon Valley Center  
801 California Street  
Mountain View, CA 94041  
(650) 988-8500

Dated: November 2, 2016

*/s/ Andrew C. Mayo*

---

John G. Day (#2403)  
Andrew C. Mayo (#5207)  
500 Delaware Avenue, 8<sup>th</sup> Floor  
P.O. Box 1150  
Wilmington, DE 19899  
(302) 654-1888  
jday@ashby-geddes.com  
amayo@ashby-geddes.com

*Attorneys for Defendant Groupon, Inc.*